

# **EXHIBIT 2**

**Subject:** FW: Filings this Weekend; Filings Under Seal  
**Date:** Wednesday, October 7, 2020 at 1:41:23 PM Eastern Daylight Time  
**From:** Bruce Brown  
**To:** Bruce Brown  
**Attachments:** image001.jpg, image002.jpg

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**From:** Bruce Brown <bbrown@brucebrownlaw.com>  
**Date:** Tuesday, October 6, 2020 at 4:18 PM  
**To:** "J. Matthew Maguire, Jr." <mmaguire@pcwlawfirm.com>, "Cross, David D." <DCross@mofo.com>  
**Cc:** Vincent Russo <vrusso@robbinsfirm.com>, Carey Miller <carey.miller@robbinsfirm.com>  
**Subject:** Re: Filings this Weekend; Filings Under Seal

OK we now understand from Carey's filing that the Secretary, preserving his deniability, does not know for sure but "understands" that Dominion has submitted an ECO to the EAC, but on a date that is apparently not knowable. It is not clear why the Secretary and its phalanx of lawyers are powerless to demand of the State's contractor confirmation as to what it is doing – particularly if (as apparently is not the case) the Secretary gives a hoot about EAC certification.

So, Matt, again, can we get the rest of the transmittal documentation and confirmation as to when it was submitted?

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**From:** "J. Matthew Maguire, Jr." <mmaguire@pcwlawfirm.com>  
**Date:** Tuesday, October 6, 2020 at 3:31 PM  
**To:** Bruce Brown <bbrown@brucebrownlaw.com>, "Cross, David D." <DCross@mofo.com>  
**Cc:** Vincent Russo <vrusso@robbinsfirm.com>  
**Subject:** RE: Filings this Weekend; Filings Under Seal

Bruce,

We have been more than cooperative with all parties, but it's been a one-way street. Dominion has voluntarily provided thousands of pages of documents on days' notice and witnesses (on many occasions) on even less notice and, yet, we've received zero cooperation from the Plaintiffs on protecting the information we provided voluntarily. I don't know what happened that put the Plaintiffs behind the eight-ball in terms of gathering the evidence for their PI motions, but this is not my client's problem.

-Matt

J. MATTHEW MAGUIRE, JR.

**PARKS | CHESIN | WALBERT**

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**From:** Bruce Brown <bbrown@brucepbrownlaw.com>  
**Sent:** Tuesday, October 6, 2020 3:15 PM  
**To:** J. Matthew Maguire, Jr. <mmaguire@pcwlawfirm.com>; Cross, David D. <DCross@mofo.com>  
**Cc:** Vincent Russo <vrusso@robbinsfirm.com>  
**Subject:** RE: Filings this Weekend; Filings Under Seal

Matt,

In his filing Friday, Vincent stated: "The same Letter Report has been submitted to the EAC for approval." We now know that if the letter was submitted, it was submitted by Dominion, your client. Matt: was Vincent's statement correct? If so, where is the documentation? Matt, I know you will play this straight, but right now this looks very strange.

Bruce

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**From:** J. Matthew Maguire, Jr. <mmaguire@pcwlawfirm.com>  
**Sent:** Tuesday, October 6, 2020 11:26 AM  
**To:** Cross, David D. <DCross@mofo.com>  
**Cc:** Bruce Brown <bbrown@brucepbrownlaw.com>  
**Subject:** RE: Filings this Weekend; Filings Under Seal

Working on it.

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**From:** Cross, David D. <DCross@mofo.com>  
**Sent:** Tuesday, October 6, 2020 9:08 AM  
**To:** J. Matthew Maguire, Jr. <mmaguire@pcwlawfirm.com>  
**Cc:** 'Bruce Brown' <bbrown@brucepbrownlaw.com>  
**Subject:** FW: Filings this Weekend; Filings Under Seal

Matt -

Will you client please provide the EAC submission and any related documentation to the SOS this morning?  
Will you please let us know ASAP?

Thanks.

DC

ROBBINS

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